UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

T.M., by and through her Guardian Ad Litem, John D. Elliott, Plaintiff, v. SC Department of Social Services (SCDSS), Irene Williams, April Fogle, Lalita Garnett, Lawanda Greggs, Alex Wright, Mary Buskey, Michelle Ingam-Smith, Anna Jones, Nicole Scott, Melissa Graham, Yvonne Wilson, Shavonna Gibson, SC Youth Advocate Program, Inc., and Kim Long, Defendants.	)	Case No: 3:15-2084-TLW **SECOND AMENDED SCHEDULING ORDER**

Pursuant to the Federal Rules of Civil Procedure and the Local Civil Rules of this Court, the following schedule is established for this case. Discovery may begin upon receipt of this order.

1. Motions to join other parties and amend the pleadings (Fed. R. Civ. P. 16(b)(1)) shall be filed no later than **March 31, 2016**.

2. Plaintiff(s) shall file and serve a document identifying by full name, address, and telephone number each person whom Plaintiff(s) expects to call as an expert at trial and certifying that a written report prepared and signed by the expert pursuant to Fed. R. Civ. P. 26(a)(2)(B) has been disclosed to other parties by **July 15, 2016**.

3. Defendant(s) shall file and serve a document identifying by full name, address, and telephone number each person whom Defendant(s) expects to call as an expert at trial and certifying that a written report prepared and signed by the expert pursuant to Fed. R. Civ. P. 26(a)(2)(B) has been disclosed to other parties by **September 15, 2016**.

4. Discovery shall be completed no later than **March 15, 2017**. All discovery requests shall be served in time for the responses thereto to be served by this date. De bene esse depositions must be completed by discovery deadline. **No motions relating to discovery shall be filed until counsel have consulted and attempted to resolve the matter as required by Local Civil Rule 7.02.**

5. All other motions, except those to complete discovery, those nonwaivable motions made pursuant to Fed. R. Civ. P. 12, and those relating to the admissibility of evidence at trial, shall be filed on or before **April 10, 2017** (Fed. R. Civ. P. 16(b)(2)).

6. Mediation, pursuant to Local Civil Rules l6.04 - 16.12, shall be completed in this case on or before **June 2, 2017**.[1] **At least twenty-eight (28) days prior to this mediation deadline** (by May 5, 2017), counsel for each party shall file and serve a statement certifying that counsel has:

(1) provided the party with Chief Judge Wooten's Standing Order to Conduct Mediation;

(2) discussed the availability of mediation with the party; and

(3) discussed the advisability and timing of mediation with opposing counsel.

(See Local Civil Rule 16.03).

7. No later than **June 16, 2017** the parties shall file and exchange Fed. R. Civ. P. 26(a)(3) pretrial disclosures. Within fourteen (14) days thereafter, a party shall file and exchange Fed. R. Civ. P. 26(a)(3) objections, any objections to use of a deposition designated by another party and any deposition counter-designations under Fed. R. Civ. P. 32(a)(4).

[1] Chief Judge Wooten's Standing Order to Conduct Mediation, which sets forth additional mediation requirements applicable to the case, is available at www.scd.uscourts.gov.

8. Counsel shall file and serve affidavits of records custodian witnesses proposed to be presented by affidavit at trial no later than **June 16, 2017**. Objections to such affidavits must be made within fourteen (14) days after the service of the disclosure. (See Fed. R. Evid. 803(6), 902(11), or 902(12) and Local Civil Rule 16.02(D)(3)).

9. Motions in limine must be filed no later than **July 6, 2017**. Written responses are due seven (7) days thereafter.

10. Parties shall furnish the Court pretrial briefs seven (7) days prior to the date set for jury selection (Local Civil Rule 26.05). Attorneys shall meet at least seven (7) days prior to the date set for submission of pretrial briefs for the purpose of exchanging and marking all exhibits. See Local Civil Rule 26.07.

11. This case is subject to being called for jury selection and trial on or after **July 26, 2017**.

s/ Terry L. Wooten
Terry L. Wooten
Chief United States District Judge

March 15, 2016

Columbia, South Carolina